



WEST RUBBER RECLAIMING DIVISION

P.O. BOX 2349 • E. ST. LOUIS, ILLINOIS 62202-2349 • Area Code 618 337-6400

February 13, 1990

Mr. Stephen A. Colantino, LUST Program Mgr.
Leaking Underground Storage Tank Unit
Remedial Project Management Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, IL. 62794-9276

Reference: St. Clair/Sauget - 900154 and 900115

Dear Mr. Colantino:

Your letters dated January 31, 1990 indicated two case numbers 900154 and 900115. The latter number was for gasoline and dipentene. This was reported to the ESDA per instruction by the Illinois State Fire Marshal Inspector. Number 900154 is already incorporated to Case Number 900115.

We have removed five (5) underground storage tanks out of seven (7) tanks that were applied for November 10, 1989 to the State Fire Marshal.

All of the five (5) tanks were checked by the inspector during exhumation and were observed to be in good condition (not leaking) except the gasoline tank. Soil samples were analyzed and as per results (see analysis report), we initiated compliance per IEPA guidelines.

The following are answers to questions 2 (a-e) through 7 of your letter:

2. (a) Dipentene tanks No. 6 & 7 were emptied and abandoned 1985; No. 14 was emptied and abandoned 1974. Gasoline tank was emptied and abandoned January 1988.

(b) Soil discoloration and odor detected around dipentene tanks 6, 7 & 14. Tanks were checked for leaks and were found to be in good condition. Release was caused by overfilling. Tank No. 14 soil analysis is safe per IEPA limits. No. 6 & 7 dipentene and the gasoline tanks will require more excavation in order to clean up discoloration and odor.

(c) Gas and dipentene tanks 6, 7 & 14 have been exhumed.

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A Division of EMPIRE CHEM, INC.

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Mr. Stephen A. Colantino

February 13, 1990

(d) Gas and dipentene tanks cleaned of residue. Gasoline put in storage tank to be used in equipment. Dipentene residue put into manufacturing process. All tanks and excavation sites have been checked for volatility.

(e) All contaminated soil is on plastic and covered.

3. N/A

4. Dipentene tanks were abandoned due to the reduced usage of this material. Gas tank was abandoned January 1988 due to the reduction of gasoline powered equipment. Release was discovered through visual inspection of the pit.

5. There were no tests performed on dipentene or gasoline tank.

6. Steps taken on the site clean up:

(a) Analyzed soil samples before clean up is initiated.

(b) Started clean up of contaminated pits as far as discoloration and odor is present following IEPA guidelines.

(c) Contaminated material on plastic and covered.

(d) Soil samples will be taken at different points for another analysis.

(e) See sampling site map attached.

(f) As applied, dipentene site will be prepared for installation of two (2) new 10,000 gal. dipentene tanks as soon as the site is safe per results of soil analysis.

(g) Contaminated soil will either be biologically treated or delivered to a special landfill in Washington, Missouri.

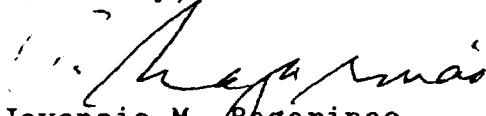
7. (a) Soil analysis performed by MetaTrace, Inc., 13715 Rider Trail North, Earth City, Missouri 63045.

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February 13, 1990

(b) Clean up done by Industrial Profit Consultants,
205 North Old St. Louis Road, Wood River, Illinois
62095.

Sincerely,



Jovencio M. Bagarinao
Plant Engineer

JMB/mkd

cc: Harry Schickling - Rubatex
Horace J. Drake
John Keserauskis

att.

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217/782-6760

Refer to: St. Clair/Sauget -- 900115
Midwest Rubber Reclaiming Division
3101 Mississippi Avenue
Compliance File

Certified Mail
Return Receipt

Notice of Release

January 31, 1990

Midwest Rubber Reclaiming Division
ATTN: John Keserauskis
3101 Mississippi Avenue
Sauget, Illinois 62206

Dear Mr. Keserauskis:

On or before January 12, 1990, a release of dipentene and gasoline occurred from an underground storage tank system(s) at 3101 Mississippi Avenue. The purpose of this notice is to inform you of your required response under 40 CFR Part 280 -- Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks.

Within 15 days of the date of this letter you must submit to this Agency:

1. The completed pink copy of the contingency plan.
2. A report which describes all action taken initially to control the situation and reduce the hazards on-site. This report must include the following:
 - a. Information concerning the removal of as much dipentene and gasoline from the tank(s) as necessary to prevent further release into the environment.
 - b. Information concerning visual inspections of any above ground release or any exposed below ground release.
 - c. Information concerning efforts to prevent the released contaminant from migrating further into surrounding soils and groundwater.
 - d. Information concerning the monitoring of fire and safety hazards, and steps that were taken to reduce those hazards posed by vapors or free product which have entered into subsurface structures such as sewers or basements.
 - e. Information concerning the safety precautions taken to control hazards posed by the excavation or exposure of contaminated soils.
3. A recovery plan for the removal of free product if applicable.

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4. A summary of inventory losses for the year prior to the discovery of the release.
5. The results of any tank and line integrity testing performed for the year prior to the release.
6. An outline describing the steps to be taken to determine the scope of the contamination and a timetable for those steps. This outline must at a minimum include a proposed schedule and methodology for soil sampling and analysis. Sampling points must be of sufficient number to locate the boundaries of the plume of contamination both vertically and horizontally. Include a site map indicating sampling points and depths.
7. A written notice listing contractors whose services have been secured to perform the analysis and cleanup.

With the exception of the contingency plan, which is to be submitted to the address indicated on the form, submit the above information to:

Illinois Environmental Protection Agency
Division of Land Pollution Control
Remedial Project Management Section
Leaking Underground Storage Tank Unit
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

Include the site number and facility name referenced at the top of page one with any correspondence concerning this matter. All correspondence should be submitted in duplicate.

Should you have any questions or require further assistance, do not hesitate to contact Dave Pluymers at 618/346-5120.

Sincerely,

SA. Colantino

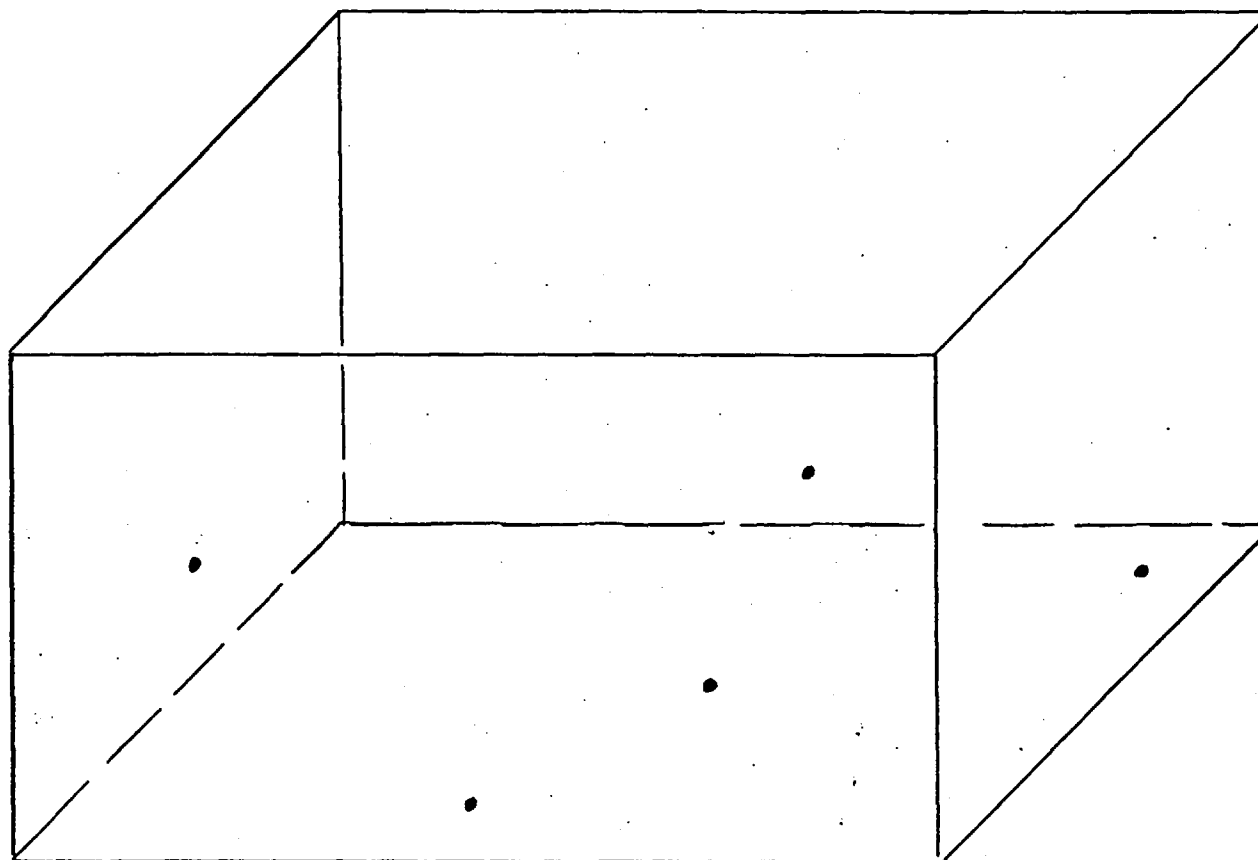
Stephen A. Colantino *by AMP*
LUST Program Manager
Leaking Underground Storage Tank Unit
Remedial Project Management Section
Division of Land Pollution Control

SAC:AMP:lab/0393n, 1-20

cc: Gary King -- Enforcement
Ken Burch -- USEPA
Division File
Dave Pluymers

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6(e). Site Map



● — Sample points on excavated Area.

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PAGE 1

metaTRACE, INC
13715 RIDER TRAIL NORTH
EARTH CITY, MO 63045
MATRIX: SOIL

BTEX

PROJECT: 217-44
CLIENT: MIDWEST RUBBER
DATE: 02/01/90
SAMPLE DATE: 01/18/90

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SAMPLE I.D. #	metaTRACE #	PARAMETER	DETECTION LIMIT	CONC	UNITS	DATE ANALYZED
NA	MVBLKE028	BENZENE	625	ND	UG/KG	01/28/90
		TOLUENE	625	ND	UG/KG	01/28/90
		XYLENE	625	ND	UG/KG	01/28/90
		ETHYLBENZENE	625	ND	UG/KG	01/28/90
		SURROGATE 1 REC.				
		TOLUENE-d8		102	PRCNT	01/28/90
		BROMOFLUOROBENZENE		102	PRCNT	01/28/90
		1,2-DICHLOROETHANE-d4		100	PRCNT	01/28/90
GASOLINE	308-001	BENZENE	31000	ND	UG/KG	01/29/90
		TOLUENE	31000	320000	UG/KG	01/29/90 = 320 ppm
		XYLENE	31000	790000	UG/KG	01/29/90 = 790 ppm
		ETHYLBENZENE	31000	240000	UG/KG	01/29/90 = 240 ppm
		SURROGATE 1 REC.				
		TOLUENE-d8		*	PRCNT	01/29/90
		BROMOFLUOROBENZENE		*	PRCNT	01/29/90
		1,2-DICHLOROETHANE-d4		*	PRCNT	01/29/90
OIL EXTRACT	308-002	BENZENE	625	ND	UG/KG	01/29/90
		TOLUENE	625	600 J	UG/KG	01/29/90
		XYLENE	625	1900	UG/KG	01/29/90
		ETHYLBENZENE	625	550 J	UG/KG	01/29/90
		SURROGATE 1 REC.				
		TOLUENE-d8		114	PRCNT	01/29/90
		BROMOFLUOROBENZENE		115	PRCNT	01/29/90
		1,2-DICHLOROETHANE-d4		117	PRCNT	01/29/90

IEPA limit for the organic compounds of Ethylbenzene, Toluene, and Xylene is 16,025 ppm.

*NOTES: NA=NOT APPLICABLE, ND=NOT DETECTED, *SURROGATES DILUTED OUT, J=ESTIMATED

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metaTRACE, INC
13715 RIDER TRAIL NORTH
EARTH CITY, MO 63045
MATRIX: SOIL

BTEX

PROJECT: 217-44
CLIENT: MIDWEST RUBBER
DATE: 02/01/90
SAMPLE DATE: 01/18/90

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SAMPLE I.D. #	metaTRACE #	PARAMETER	DETECTION LIMIT	CONC	UNITS	DATE ANALYZED
DIPENTENE # 7	308-003	BENZENE	31000	ND	UG/KG	01/29/90
		TOLUENE	31000	42000	UG/KG	01/29/90 = 42 ppm
		XYLENE	31000	78000	UG/KG	01/29/90 = 78 ppm
		ETHYLBENZENE	31000	92000	UG/KG	01/29/90 = 92 ppm
		SURROGATE Z REC.				
		TOLUENE-d8			PRCNT	01/29/90
		BROMOFLUOROBENZENE			PRCNT	01/29/90
		1,2-DICHLOROETHANE-d4			PRCNT	01/29/90
DIPENTENE # 6	308-004	BENZENE	31000	ND	UG/KG	01/29/90
		TOLUENE	31000	19000 J	UG/KG	01/29/90 = 19 ppm
		XYLENE	31000	28000 J	UG/KG	01/29/90 = 28 ppm
		ETHYLBENZENE	31000	34000	UG/KG	01/29/90 = 34 ppm
		SURROGATE Z REC.				
		TOLUENE-d8			PRCNT	01/29/90
		BROMOFLUOROBENZENE			PRCNT	01/29/90
		1,2-DICHLOROETHANE-d4			PRCNT	01/29/90
DIPENTENE # 14	308-005	BENZENE	625	ND	UG/KG	01/29/90
		TOLUENE	625	ND	UG/KG	01/29/90
		XYLENE	625	1200	UG/KG	01/29/90
		ETHYLBENZENE	625	ND	UG/KG	01/29/90
		SURROGATE Z REC.				
		TOLUENE-d8		110	PRCNT	01/29/90
		BROMOFLUOROBENZENE		114	PRCNT	01/29/90
		1,2-DICHLOROETHANE-d4		108	PRCNT	01/29/90

*NOTES: NA=NOT APPLICABLE, ND=NOT DETECTED, *SURROGATES DILUTED OUT, J=ESTIMATED

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Complete this form.

**Contingency Plan
Leaking Underground Storage Tank Problems**

City Sauget Incident # 900115

Site Name Midwest Rubber Reclaiming Division

Address 3101 Mississippi Avenue

Sauget, IL. 62206

Site Phone (618) 337-6400

Person representing the site with authority to approve remediation expenditures in an emergency
Horace J. Drake

Phone (618) 337-6400

After-hours Phone _____

Contractor Hired for Tank Removal Industrial Profit Consultants

Phone (618) 254-4343

After-hours Phone Same

Contractor Available for Emergency Response Industrial Profit Consultants

Phone (618) 254-4343

After-hours Phone Same

In case of Additional Petroleum Product spillage or discovery of products or vapors in the
Sewers, Streams, and/or Buildings **IMMEDIATELY** Notify all the Following:

Local Fire Department _____ Phone _____

Local Police Department _____ Phone _____

Sewer Authority _____ Phone _____

After-Hours Phone _____

Illinois Emergency Services and Disaster Agency and ask for the IEPA Duty Officer

Phone 800/782-7860

Confirm that the emergency contractor is available and willing to respond to this site. Then post the original
in a prominent place for your employees and send the carbon to:

IEPA-ERU #29

2200 Churchill Road

Post Office Box 19276

Springfield, Illinois 62794-9276

Illinois Environmental Protection Agency — Emergency Response IEPA-ERU

Phone 217/782-3637